

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NORTH DAKOTA  
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

DAKOTA JAMES CHARBONEAU

**INDICTMENT**

Case No. \_\_\_\_\_

Violation: 18 U.S.C. §§ 113(a)(3);  
113(a)(6); 924(c)(1)(A); 1151; 1153;  
1201(a); and 2261(a)(2)

**COUNT ONE**

**Assault Resulting in Serious Bodily Injury**

The Grand Jury Charges:

On or about November 20, 2017, in the District of North Dakota, in Indian country, and within the exclusive jurisdiction of the United States,

DAKOTA JAMES CHARBONEAU

an Indian, did assault Rolynda Herald, which assault resulted in serious bodily injury to Rolynda Herald;

In violation of Title 18, United States Code, Sections 113(a)(6) and 1153.

COUNT TWO

**Assault with a Dangerous Weapon**

The Grand Jury Further Charges:

On or about November 20, 2017, in the District of North Dakota, in Indian country, and within the exclusive jurisdiction of the United States,

DAKOTA JAMES CHARBONEAU,

an Indian, did assault Rolynda Herald with a dangerous weapon by shooting her with a .410 shotgun, with intent to do bodily harm and without just cause and excuse;

In violation of Title 18, United States Code, Sections 113(a)(3) and 1153.

COUNT THREE

**Discharge of a Firearm in Relation to a Felony Crime of Violence**

The Grand Jury Further Charges:

On or about November 20, 2017, in the District of North Dakota, in Indian country, and within the exclusive jurisdiction of the United States,

DAKOTA JAMES CHARBONEAU

knowingly used, carried, and discharged a firearm, that is, a .410 shotgun, during and in relation to a felony crime of violence for which he may be prosecuted in a court of the United States, that is, DAKOTA JAMES CHARBONEAU discharged a firearm during and in relation to an Assault With A Dangerous Weapon, as set forth in Counts One and Two of this Indictment, the descriptions of which are hereby incorporated by reference;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT FOUR

**Kidnapping**

The Grand Jury Further Charges:

On or about November 20, 2017, in the District of North Dakota, in Indian country, and within the exclusive jurisdiction of the United States,

DAKOTA JAMES CHARBONEAU

an Indian, knowingly and unlawfully seized, confined, inveigled, decoyed, kidnapped, abducted, carried away, and willfully transported Rolynda Herald in Indian country and held her for the purpose of physically assaulting her and discharging a firearm at her resulting in serious bodily injury to her eye;

In violation of Title 18, United States Code, Sections 1201(a)(1), 1151, and 1153.

COUNT FIVE

**Interstate Domestic Violence – Causing Travel of Victim**

The Grand Jury Further Charges:

On or about November 20, 2017, in the District of North Dakota, and elsewhere,

DAKOTA JAMES CHARBONEAU

caused Rolynda Herald, a dating partner, to enter Indian country by force, coercion, duress, and fraud, and while in the course of, and as a result of, and to facilitate such conduct and travel, committed and attempted to commit assault resulting in serious bodily injury by the use and discharge of a firearm as set forth in Counts One and Two of this Indictment, the descriptions of which are hereby incorporated by reference, and a crime of violence against Rolynda Herald;

In violation of Title 18, United States Code, Section 2261(a)(2);

A TRUE BILL:

/s/ Foreperson  
Foreperson

/s/ Christopher C. Myers  
CHRISTOPHER C. MYERS  
United States Attorney

JMM:tla